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MICHAEL EMERY [A0990]
MARTHA KNUDSON [A8512]
RICHARDS, BRANDT, MILLER & NELSON
Attorneys for Plaintiff
Key Bank Tower, Seventh Floor
50 South Main Street
P.O. Box 2465
Salt Lake City, Utah 84110-2465
Telephone: (801) 531-2000
Fax No.: (801) 532-5506

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF UTAH, CENTRAL DIVISION

C.R. ENGLAND, INC.,

Plaintiff,

vs.

DEDICATED TRANSPORTATION
SERVICES, INC.,

Defendant.

COMPLAINT

2:01 CV 0130 G

Civil No. _____

Judge: _____

Plaintiff, C.R. England, Inc. ("England"), hereby complains of defendant,
Dedicated Transportation Services, Inc., ("Dedicated"), and alleges as follows:

1. England is a Utah corporation with its principal place of business located in Salt Lake County, Utah.
2. Dedicated is a California corporation with its principal place of business in Santa Ana, California, that is authorized and conducts business in the State of Utah.

3. This Court has subject matter jurisdiction over this dispute pursuant to 28 U.S.C. §1332.

4. Venue is also proper in this judicial district under 28 U.S.C. §1391.

5. On or about December 20, 1999 England and Dedicated entered into a Transportation Services Agreement (“Services Agreement”). A true and correct copy of this Services Agreement is attached hereto as Exhibit “A” and by this reference made a part hereof.

6. Under this Services Agreement, England advanced and agreed to provide certain services to Dedicated, and Dedicated made certain covenants with respect to the payment for such services.

7. England has fully performed all of its obligations under the Services Agreement.

8. Dedicated has materially breached its payment obligation to England under the Services Agreement by failing to pay when due the amounts owing thereunder.

9. Despite repeated demands, Dedicated has failed, refused or neglected to pay England the past due and owing sum of \$237,062.38.

10. As a direct and proximate result of Dedicated’s breach of contract, England has been damaged in an amount estimated to be at least two hundred thirty seven thousand, sixty two dollars and thirty eight cents (\$237,062.38), plus costs and attorneys fees.

Based upon the foregoing, plaintiff, England prays against defendant, Dedicated,
as follows:

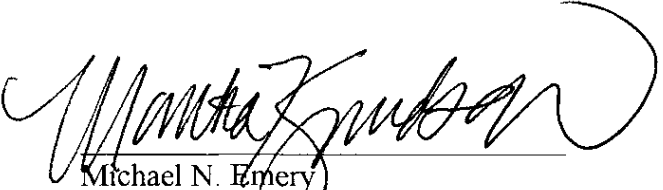
1. For judgment in the amount of \$237,062.38, plus costs and attorney's fees;
2. For pre and post-judgment relief;
3. For further damages which England may incur from this time forward,

which shall be proven at trial; and

4. For such other and further relief as the Court deems just and equitable
under the circumstances.

RESPECTFULLY SUBMITTED this 23 day of February, 2001.

RICHARDS, BRANDT, MILLER
& NELSON


Michael N. Emery
Martha Knudson
Attorneys for Plaintiff

Plaintiff's Address:

C.R. England
P.O. Box 27728
Salt Lake City, UT
84127-0728

5291-125/ 340165